

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

MICHAEL W. BISHOP

Plaintiff,

V.

LEONIDES PUERTAS, individually and/or as agent, servant and/or employee of SOUTH GOLD CORP., and SOUTH GOLD CORP., individually

Defendants.

CIVIL ACTION NO.:

## NOTICE OF REMOVAL

Defendants Leonides Puertas and South Gold Corporation, by and through their counsel,  
Rawle & Henderson LLP, respectfully aver as follows:

1. Plaintiff commenced a civil action against defendants Leonides Puertas and South Gold Corporation in the Superior Court of New Jersey for Union County on or about June 7, 2011, as a result of an alleged May 9, 2010 motor vehicle accident. See Plaintiff's Civil Complaint attached as Exhibit "A."

2. The Complaint, being the original process in this case, was first received by defendants on April 3, 2012. Thus, this Notice of Removal is filed within the time provided by 28 U.S.C. §1446(b).

3. This action satisfies the requirements for removal within the meaning of 28 U.S.C. §1332 in that:

a) Plaintiff and defendants' citizenships are diverse;

1) Plaintiff is a resident and citizen of the state of New Jersey.

According to the Complaint, Plaintiff resides at 1181 Main Street, Apt. 1G, in Rahway, New Jersey.

2) Defendants are citizens of a state other than New Jersey. Defendant, South Gold Corporation, is incorporated under the laws of the State of Florida with a principal place of business in Opa Locka, Florida.

3) Defendant Leonides Puertas is a resident and citizen of the state of Florida.

b) The amount in controversy exceeds \$75,000, exclusive of interest and costs. In the Complaint, plaintiff seeks damages for, *inter alia*, the following:

4. As a direct and proximate result of the aforesaid, Plaintiff, Michael W. Bishop, was caused to suffer serious injuries in and about his head, limbs and body; he was caused to incur medical expenses and will in the future be caused to incur medical expenses; he was caused to lose time from his usual pursuits and occupations and will in the future be caused to lose time from his usual pursuits and occupations; he was caused to incur permanent injuries.

See Exhibit "A."

4. Additionally, defendants were advised by plaintiff's counsel that plaintiff allegedly sustained lumbar and cervical disc herniations as a result of the May 9, 2010 motor vehicle accident.

5. Therefore, a fair reading of the Complaint combined with the averments made by plaintiff's counsel reveals that an amount in excess of \$75,000 is at controversy in this suit.

WHEREFORE, defendants Leonides Puertas and South Gold Corporation request that the above action now pending in the Superior Court of New Jersey for Union County, be removed therefrom to this Court.

Respectfully submitted,

RAWLE & HENDERSON LLP

By: s// Dawn L. Jennings  
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Attorneys for Defendants

Dated: May 2, 2012

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Notice of Removal was served upon the below listed counsel and parties by first-class mail, postage prepaid.

Robert J. Cardonsky, Esquire  
Forman & Cardonsky  
701 Westfield Avenue  
Elizabeth, New Jersey 07208

s// Dawn L. Jennings  
Dawn L. Jennings

Date: